

# LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
DAVID A. LAFURIA  
PAMELA L. GIST  
TODD SLAMOWITZ\*  
BROOKS E. HARLOW\*  
TODD B. LANTOR\*  
STEVEN M. CHERNOFF\*  
KATHERINE PATSAS NEVITT\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
—  
OF COUNSEL  
GEORGE L. LYON, JR.  
LEONARD S. KOLSKY\*  
JOHN CIMKO\*  
J. K. HAGE III\*  
JOHN J. MCAVOY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS BROWN\*  
JEFFREY A. MITCHELL\*  
ROBERT S. KOPPEL\*  
MARC A. PAUL\*

\*NOT ADMITTED IN VA

Writer's Direct Dial  
(703) 584-8665  
pgist@fcclaw.com

February 10, 2012

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: EB Docket No. 06-36  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2011

Progress International, LLC  
Form 499 Filer ID 825928

Dear Ms. Dortch:

On behalf of Progress International, LLC, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification for 2011 with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Best Copy and Printing, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification covering calendar year 2011

Date filed: February 10, 2012

Name of company covered by this certification:

Progress International, LLC

Form 499 Filer ID: 825928

Address: 10190 Katy Freeway, Suite 410  
Houston, Texas 77043-5218

Name of signing officer: Roberto Xavier Margain Santos

Title of signatory: Officer/Secretary


**CERTIFICATION**

I, Roberto Xavier Margain Santos, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

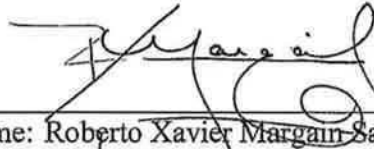
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.



The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



---

Name: Roberto Xavier Margain Santos  
Title: Officer/Secretary  
Date: February 8, 2012

**Attachment:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

Company Name ("Carrier"): Progress International, LLC

### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier does not provide end user services in the United States. Carrier provides services only to other carriers. Carrier does not use proprietary information for any other purpose than to provide service to other carriers.
- Carrier does not use proprietary information for its own marketing efforts. Carrier does not use, disclose or permit access to CPNI for the purpose of providing or marketing services of its affiliate or third parties.
- Carrier has substantial processes and controls for both physical security and access to data. Customers are provided services under contracts with express confidentiality provisions, and have dedicated account representatives with access to customer data.
- Carrier maintains and utilizes CPNI for the limited purposes of initiating, rendering, billing and collecting for its services, and may use CPNI, if necessary, to protect its property rights, or to protect other carriers from fraudulent, abusive or unlawful use of, or subscription to, Carrier's services.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.
- Carrier's customer service representatives do not have access to call detail information. Carrier ensures that access to all call detail information is safeguarded from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to this information. Carrier has instituted restrictions regarding access, use and disclosure of such records.
- Carrier does not disclose call record information over the telephone, or in person, and does not provide for customer on-line access to card or call information. Password and other authentication process are not applicable in this environment.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- Carrier took the following actions against data brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: : No actions taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2011 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: No complaints received
  - Category of complaint:
    - 0 Number of instances of improper access by employees
    - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
    - 0 Number of instances of improper access to online information by individuals not authorized to view the information
    - 0 Number of other instances of improper access or disclosure
  - Summary of customer complaints received in 2011 concerning the unauthorized release of CPNI: Not Applicable

